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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DONALD RAMSEY, Individually and on
 Behalf of All Others Similarly Situated,

Plaintiff,

vs.

COINBASE GLOBAL, INC., et al.,

Defendants.

Case No.: 3:21-cv-05634-VC

**[PROPOSED] ORDER
 CONSOLIDATING RELATED
 ACTIONS AND APPOINTING LEAD
 PLAINTIFFS AND CO-LEAD
 COUNSEL**

CLASS ACTION

Judge: Vince Chhabria
 Hearing Date: October 28, 2021
 Time: 2:00 pm
 Ctrm: Courtroom 4, 17th Floor

GABBY KLEIN, Individually and on
 Behalf of All Others Similarly Situated

Plaintiff,

v.

COINBASE GLOBAL, INC., et. al,

Defendants.

Case No.: 3:21-cv-06049

MATTHEW CATTERLIN, Individually and on
 Behalf of All Others Similarly Situated

Plaintiff,

v.

COINBASE GLOBAL, INC., et. al,

Defendants.

Case No.: 3:21-cv-06149

1 WHEREAS, the above-captioned securities class actions were filed against Coinbase Global,
2 Inc., et al. (collectively “Defendants”), alleging violations of the federal securities laws;

3 WHEREAS, these actions involve common issues of fact and law;

4 WHEREAS, pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”) and
5 15 U.S.C. § 77z-1(a)(3)(A)(i), on July 22, 2021, notice was issued to potential class members of the
6 action and informed them of their right to move to serve as lead plaintiff within 60 days of the date
7 of the issuance of said notice;

8 WHEREAS, on September 20, 2021, Movants Hsiu-Mei Yu and Minorka Snow (“Movants”
9 or “Coinbase Investor Group”) timely moved the Court to appoint Movants as Lead Plaintiffs and
10 approve Movants’ selection of WeissLaw LLP (“WeissLaw”) and Federman & Sherwood
11 (“Federman”) as Co-Lead Counsel;

12 WHEREAS, the PSLRA, provides, inter alia, that the most-adequate plaintiff to serve as lead
13 plaintiff is the person or group of persons that has either filed a complaint or has made a motion in
14 response to a notice, and has the largest financial interest in the relief sought by the Class and satisfied
15 the pertinent requirements of Fed. R. Civ. P. 23; and

16 WHEREAS, the Court finding that Movants have the largest financial interests in this action
17 and prima facie satisfy the typicality and adequacy requirements of Fed. R. Civ. P. 23. *See* 15 U.S.C.
18 § 77z-1(a)(3)(B)(iii)(I);

19 **IT IS HEREBY ORDERED THAT:**

20 **APPOINTMENT OF LEAD PLAINTIFF AND COUNSEL**

21 1. The above-captioned actions are consolidated for all purposes (the “Consolidated
22 Action”). This order (the “Order”) shall apply to the Consolidated Action and to each case that relates
23 to the same subject matter that is subsequently filed in this Court or is transferred to this Court and
24 consolidated with the Consolidated Action. A Master File is established for this proceeding. The
25 Master File shall be captioned: *In re Coinbase Securities Action*, Case No. 3:21-cv-05634-VC.

2. Pursuant to Section 27 of the Securities Act of 1933, Movants are appointed Lead Plaintiffs of the Class as Movants have the largest financial interest in this litigation and otherwise satisfy the requirements of Fed. R. Civ. P. 23.

3. Movants' choice of counsel is approved, and accordingly, WeissLaw and Federman are appointed Co-Lead Counsel.

4. Co-Lead Counsel, after being appointed by the Court, shall manage the prosecution of this litigation. Co-Lead Counsel is to avoid duplicative or unproductive activities and is hereby vested by the Court with the responsibilities that include, without limitation, the following: (1) to prepare all pleadings; (2) to direct and coordinate the briefing and arguing of motions in accordance with the schedules set by the orders and rules of this Court; (3) to initiate and direct discovery; (4) to prepare the case for trial; and (5) to engage in settlement negotiations on behalf of Lead Plaintiffs and Class.

SO ORDERED:

Dated: _____, 2021

HON. VINCE CHHABRIA
UNITED STATES DISTRICT JUDGE